

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Joseph Marlin Kilmer
d/b/a Keystone Continental
Destinations**

Debtor(s)

Nationstar Mortgage LLC

Movant

vs.

**Joseph Marlin Kilmer d/b/a Keystone
Continental Destinations**

Debtor(s)

Kara Katherine Gendron,

Trustee

BK NO. 19-02790 HWV

Chapter 7

Related to Document No. 91

**RESPONSE TO TRUSTEE'S MOTION FOR AUTHORITY TO SELL AND TRANSFER
REAL ESTATE AT TRUSTEE'S AUCTION SALE**

Nationstar Mortgage LLC enters its response to the Trustee's Motion for Authority to Sell and Transfer Real Estate at Trustee's Auction Sale.

1. Creditor's loan is secured by a mortgage on Debtor's property at 125 State Street, Harrisburg, PA 17101.

2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, Nationstar Mortgage LLC, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: June 8, 2023

/s/ Brian C. Nicholas

Brian C. Nicholas, Esquire

bnicholas@kmlawgroup.com

Attorney I.D. No. 317240

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106

Phone: 201-549-5366

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Joseph Marlin Kilmer
d/b/a Keystone Continental Destinations
Debtor(s)**

BK NO. 19-02790 HWV

Chapter 7

**Nationstar Mortgage LLC
Movant**

Related to Doc. No. 91

vs.

**Joseph Marlin Kilmer d/b/a Keystone
Continental Destinations
Debtor(s)**

**Kara Katherine Gendron,
Trustee**

**CERTIFICATE OF SERVICE
RESPONSE TO TRUSTEE'S MOTION FOR AUTHORITY TO SELL AND
TRANSFER REAL ESTATE AT TRUSTEE'S AUCTION SALE**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 8, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Joseph Marlin Kilmer d/b/a Keystone
Continental Destinations
112 Clover Lane
Port Royal, PA 17082

Attorney for Debtor(s) (via ECF)

Chad J. Julius
Jacobson & Julius
8150 Derry Street
Suite A
Harrisburg, PA 17111

Trustee (via ECF)

Kara Katherine Gendron
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101

James H. Turner
Turner and O'Connell
915 North Mountain Road
Suite D
Harrisburg, PA 17112

Method of Service: electronic means or first-class mail.

Dated: June 8, 2023

/s/Brian C. Nicholas Esquire

Brian C. Nicholas Esquire
Attorney I.D. 317240
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-5366
bnicholas@kmlawgroup.com